<u>REMARKS</u>

Claims 5-6, 9, 11, 13, 15, and 17 stand rejected under 35 U.S.C. 103(a) as being obvious over Sauntry et al. (U.S. Patent No. 6,349,344), in view of Crelier (U.S. Patent No. 5,978,585). Applicant traverses the rejection because there is no motivation or suggestion to combine the two references.

To establish a *prima facie* case for an obvious rejection, the Examiner must show a motivation or suggestion to combine the references.

Sauntry relates to "Java class files, and more particularly to the combination of such files into a run-time image", which decreases execution time and decreases the amount of storage space used for storing Java files. (Col. 1, lns. 5-7). Indeed, Sauntry's goal is to decrease the time for execution and decrease the amount of storage space required for storing Java files. Sauntry attempts to overcome three problems. First, "the typical Java program uses many class files, such that loading and parsing these class files at run-time takes a long time." (Col. 2, lns. 9-11). Second, "each Java class file contains a copy of all the data required to run that class," which often wastes memory. (Col. 2, lns. 30-37). Third, in a Java environment two versions of the class files have to be stored; "the unloaded and unparsed Java class files in storage (either in RAM or ROM), and the loaded and parsed Java class files in RAM." (Col. 2, lns. 46-57). Overcoming these problems while decreasing the execution time and storage space of files is a goal of Sauntry.

Crelier teaches away from this goal of Sauntry (i.e., does not teach decreasing execution time and decreasing the amount of storage required for storing Java

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files). Crelier teaches a timestamping process that increases execution time and increases the amount storage space needed for storing Java files. If Crelier were combined with Sauntry, then the problems that Sauntry tries to overcome would be further exasperated.

In addition, Sauntry discloses creating a run-time image, such as a DLL, from multiple Java files, thereby "permitting faster native member function resolution." (Col. 3, lns. 2-16). Sauntry's configuration removes a key feature of Java: namely, portability between computer architectures.
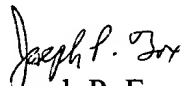
In contrast, Crelier discloses storing the Java files in their normal ".class" format, thereby allowing portability among computer system architectures. Accordingly, for these reasons, Applicants believe that one of ordinary skill would not have been motivated to combine Sauntry and Crelier. Therefore, reconsideration and withdrawal of the §103 rejection of claims 5-6, 9, 11, 13, 15, and 17 is respectfully requested.

For all of the foregoing reasons, Applicant submits that this Application is in condition for allowance, which is respectfully requested. The Examiner is invited to contact the undersigned attorney if an interview would expedite prosecution.

Respectfully submitted,

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